



florencecopper.com

January 14, 2021

Ms. Nancy Rumrill U.S. Environmental Protection Agency, Region 9 Drinking Water Protection Services, WTR-3-2 75 Hawthorne Street San Francisco, California 94105

Re: Transmittal of Supplemental Information in Support of Application for Underground Injection Control Permit, Florence Copper Project, Florence, Arizona

Dear Ms. Rumrill:

Pursuant to our telephone conversations on January 7, 2021, Florence Copper Inc. (Florence Copper) herewith transmits supplemental information in support of our application for an Underground Injection Control (UIC) Permit submitted to the U.S. Environmental Protection Agency (USEPA) on October 4, 2019 (Application). This information reflects our understanding of, and response to, questions the USEPA has regarding previously submitted Application materials.

Each of the sections below begins with our stated understanding of the additional information required by the USEPA, followed by our response, which includes references to the attached materials.

Request 1:

The USEPA requested that Florence Copper incorporated the ACD demonstration proposal dated December 10, 2020, into Attachment C of the UIC Application. USEPA also requested that Florence Copper include information in the text describing the demonstration describing data collection and analyses to be conducted in advance of the completion of the 6-month demonstration.

Response 1:

Florence Copper has revised Attachment C of the UIC Application to include the requested information. Attachment C has been revised to include two new sections (C.2.5.2 and C2.5.3) describing the planned ACD demonstration and contingency actions to be taken depending on the results of the demonstration. Data collection and analyses to be conducted during the ACD demonstration include monthly data collection and analysis to evaluate trends and changing conditions during the advancement of injected solutions.

A new section (C.2.5.1) was also added to Attachment C to incorporate contingency actions to be undertaken in response to ACD monitoring which were previously submitted to USEPA in conjunction with the ACD demonstration.



Florence Copper has provided herewith a complete electronic copy of the revised Attachment C.

Please contact me at 520-316-3710 if you require any additional information.

Sincerely,

Florence Copper Inc.

Brent Berg

General Manager

cc: Maribeth Greenslade, Arizona Department of Environmental Quality

Enclosures

Attachment C

Attachment A &